

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

DAMIAN STINNIE, MELISSA ADAMS, and ADRAINNE JOHNSON, individually, and on behalf of all others similarly situated; WILLIEST BANDY, and BRIANNA MORGAN, individually, and on behalf of all others similarly situated,

Plaintiffs,

v.

RICHARD D. HOLCOMB, in his official capacity as the Commissioner of the VIRGINIA DEPARTMENT OF MOTOR VEHICLES,

Defendant.

Civ. No: 3:16-cv-00044

PLAINTIFFS' PETITION FOR ATTORNEYS' FEES AND LITIGATION EXPENSES

COME NOW Plaintiffs, by counsel, and hereby request reasonable attorneys' fees and all other litigation expenses and costs to which they are entitled pursuant to 42 U.S.C. § 1988 or any other applicable rule or statute. Pursuant to this Court's Order addressing briefing (ECF 232) and in support of this Petition, Plaintiffs incorporate herein their contemporaneously filed Memorandum demonstrating their status as prevailing parties, which entitles them to recover.

Plaintiffs respectfully ask that this Court (1) grant this Petition, (2) hold that Plaintiffs are prevailing parties and their attorneys are entitled to fees and other expenses and costs under 42 U.S.C. § 1988, (3) enter the Proposed Order attached as Exhibit A, and (4) invite the parties to submit briefing on the reasonableness and amount of fees and expenses and costs to be awarded

on a schedule consistent with this Court's Order dated May 7, 2020. If this Court grants the instant Petition, Plaintiffs will file additional papers concerning the requested amount, with detailed supporting documentation and briefing, within sixty days of the entry of such Order.

(See ECF 232 at 2.)

Respectfully submitted,

By: /s/ Jonathan T. Blank

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on July 2, 2020, I electronically filed the foregoing Plaintiffs' Petition for Attorneys' Fees and Litigation Expenses with the Clerk of Court using the CM/ECF System, which will send a notification of such filing to all CM/ECF participants, including counsel for the Defendant.

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